

REMARKS

Claims 1 - 3, 6, 9, 12 - 16, 18 and 20 - 23 stand rejected under 35 U.S.C. 102(e) as being anticipated by Roberts (U.S. Patent 6,101,486). Applicant respectfully disagrees with the rejection for the reasons given in her response filed 08/23/05 and further for the following reasons.

Applicant's claim 1 clearly requires in the last clause, creating a vision of a supplier's core competencies based on three elements recited in earlier clauses. Roberts does not describe or suggest all three elements as will be explained below. Claim 1 then requires that an opportunity be developed consistent with the vision, by merging together and optimizing the vision with supplier's channel awareness.

The Examiner states in his Response to Arguments (page 5 and 6 of the present office action dated 11/16/2005) that the steps of claim 1 are "equivalent to delivering content or opportunity by customizing or personalizing it based on user's profile." Applicant disagrees. A profiled past of the user is just one of three elements recited in claim 1. Furthermore, claim 1 requires that a vision be created based on the three elements. The Examiner's statement of equivalency ignores this important step. Claim 1 then requires that this vision be merged together and optimized with the supplier's channel awareness. Again, this important merging and optimizing step is not present in the Examiner's statement of equivalency. In net, claim 1 is not "equivalent to delivering content or opportunity by customizing or personalizing it based on user's profile." Such, delivering of content or opportunity by customizing or personalizing is well known in the art as noted in the Background section of Applicant's Specification, page 1, line 21 - page 2, line 13.

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The Three elements recited in claim 1 for creating a vision of a supplier's core competencies are specifically 1) in the moment point of contact constraints of the user, 2) a profiled past of the user including purchased data which is grouped or keyed to presenting a lifestyle or lifestage view of the user, and 3) current actions. Each of these is further described in Applicant's Specification and Drawings. The Examiner states that "the prior art teaches delivering an opportunity to user based on past profile including purchased data and point of contact constraints." This is only two elements, not the three required by Applicant's claim 1. Furthermore, there is no description or suggestion in Roberts of purchased data, which is grouped or keyed to presenting a lifestyle or lifestage view of the user as required by Applicant's claim 1.

As noted above, Roberts does not describe or suggest Applicant's requirement in claim 1 of creating a vision of a supplier's core competencies based on the three elements. Roberts also does not describe or suggest developing an opportunity consistent with the vision, by merging together and optimizing the vision with the supplier's channel awareness.

For these reason, Roberts does not anticipate Applicant's invention of claim 1. Claim 1 is therefore allowable over Roberts and such allowance is respectfully requested.

Likewise, independent claims 21, 22, and 23 are also allowable over Roberts because each recites the limitation in allowable claim 1.

All of the other pending claims are dependent directly or indirectly on allowable independent claims 1, 21, 22, or 23 and

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3

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are therefore also allowable.

Claims 4 - 8 and 17 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Roberts in view of Lee (U.S. Patent 6,829,475). However, this rejection is moot because claims 4 - 8 and 17 are allowable as noted above.

Applicant, therefore, respectfully requests withdrawal of the rejections under 35 U.S.C. 102(e) and 35 U.S.C. 103(a), and allowance of all of the pending claims.

The Application is deemed in condition for allowance and such action by the Examiner is urged. Should differences remain, however, which do not place one/more of the remaining claims in condition for allowance, the Examiner is requested to phone the undersigned at the number provided below for the purpose of providing constructive assistance and suggestions in accordance with M.P.E.P. Sections 707, 707.07(d) and 707.07(j) in order that allowable claims can be presented, thereby placing the application in condition for allowance without further proceedings being necessary.

Respectfully submitted.

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4

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